

PCMP CONTRACTING & ATTRIBUTION

December 2014

The Accountable Care Collaborative (ACC) is designed to transform Colorado Medicaid into a system that encourages and rewards integrated, person-centered care. To achieve this, the ACC's goal is to link every member to a primary care medical provider (PCMP) as his or her central point of care. In accordance with this philosophy, the Department is presenting the following clarification of its PCMP contracting requirements to allow for the inclusion of additional providers who serve as a source of primary care for its members.

Background

On January 22, 2014, the ACC Program Improvement Advisory Committee (PIAC) made a formal recommendation to the Department of Health Care Policy and Financing (Department) which included the following points:

- Maintain the current requirements and contracting language for participating PCMPs in the program;
- Clarify that additional providers not currently contracted as PCMPs may meet the contract requirements and can be formally recognized as PCMPs; and
- Re-evaluate the requirements and contract language at the time of reprocurement for Regional Care Collaborative Organization (RCCO) contracts.

The recommendation was made following a five-month process that engaged discussion with RCCO representatives, the Quality and Health Improvement Subcommittee, the Provider and Community Relations Subcommittee, and other stakeholders.

In response, the Department has determined that **additional providers may currently meet the requirements for contracting as PCMPs** and encourages the RCCOs to work with interested providers to enroll as PCMPs in the ACC when those providers meet the current contractual requirements.

PCMP Requirements

All PCMPs must meet the current contract language requirements that state:

- 3.3.1 In order to participate as a PCMP in the ACC program, the Contractor shall:
 - 3.3.1.1 Be enrolled as a provider in the Colorado Medicaid program;
 - 3.3.1.2 Be any of the following:



- 3.3.1.2.1. Certified by the Department as a provider in the Medicaid and CHP+ Medical Homes for Children program
- 3.3.1.2.2. A Federally Qualified Health Center (FQHC), Rural Health Clinic (RHC) or a clinic or other group practice with a focus on primary care, general practice, internal medicine, pediatrics, geriatrics, or obstetrics and gynecology; or
- 3.3.1.2.3. An **individual physician, advanced practice nurse or physician assistant** with a focus on primary care, general practice, internal medicine, pediatrics, geriatrics, or obstetrics and gynecology;
- 3.3.1.3 Act as a dedicated source of primary care for Members and be capable of delivering the majority of the Members' comprehensive primary, preventive, and sick medical care;
- 3.3.1.4 Be currently licensed by the Colorado Medical Board or the Colorado Board of Nursing to practice in the State of Colorado.

PCMP Contracting Process

RCCOs will be responsible for reviewing the above requirements with potential PCMPs and contracting with those it deems eligible. PCMPs must also contract with the Department; the RCCOs will provide guidance regarding this process.

Client Attribution to new PCMPs

Once PCMPs complete the contracting process, the Department will attribute clients to the PCMP based on current ACC attribution policy which considers previous healthcare utilization (including utilization of family members) and client choice. Clients who have a history of evaluation and management claims with a PCMP during the past 12 months will be automatically attributed to that PCMP. All claims submitted to Behavioral Health Organizations are not considered in the attribution process. If a client does not have a claims history, the client will be asked to select a PCMP. For clients who remain unattributed, the Department will rerun the attribution process on a monthly basis. Clients that are currently attributed to a PCMP may only have their attribution changed when the client requests to be attributed to a different PCMP.

Questions

If you have any questions or need additional clarification, please contact either Mark Queirolo, Integrated Health Specialist, Program Innovation Section, at (303) 866-5449 or mark.queirolo@state.co.us, or Marty Janssen, Contract Manager, ACC Program, at (303) 866-4095 or marty.janssen@state.co.us.

